

Message

From: Ho, Yenhung [Ho.Yenhung@epa.gov]
Sent: 1/8/2020 8:36:58 PM
To: Albright, David [Albright.David@epa.gov]
Subject: RE: Response to CES QASP Question

Thank you for the information. Yes, we will discuss our approach for responding.

Noted that 40 CFR 146.41 refers to minor modifications of permits.

From: Albright, David <Albright.David@epa.gov>
Sent: Wednesday, January 8, 2020 12:16 PM
To: Ho, Yenhung <Ho.Yenhung@epa.gov>
Subject: FW: Response to CES QASP Question

Hi Calvin, I'm sorry, I meant to cc you on this email traffic. We should discuss our approach for responding to CES (or perhaps HQs will want to do that once we agree on the response....). Thanks, David

From: Albright, David
Sent: Wednesday, January 8, 2020 9:21 AM
To: McEvoy, Molly <mcevoy.molly@epa.gov>
Cc: Kobelski, Bruce <Kobelski.Bruce@epa.gov>; Bates, William <bates.william@epa.gov>
Subject: RE: Response to CES QASP Question

Thanks Molly. I'm not thrilled with the last sentence – "Changes to this document may not trigger a major permit modification (40 CFR 144.41(h))." Because this means also that changes to the document may trigger a major mod. Unless that is not what is meant. I'd actually prefer to just stop the reply at "post-construction" and address the mod question if it is posed.

From: McEvoy, Molly <mcevoy.molly@epa.gov>
Sent: Wednesday, January 8, 2020 8:28 AM
To: Albright, David <Albright.David@epa.gov>
Cc: Kobelski, Bruce <Kobelski.Bruce@epa.gov>; Bates, William <bates.william@epa.gov>
Subject: RE: Response to CES QASP Question

Hi David,

I realized I referred to the wrong company in my email. The email below was in reference to the question from Clean Energy Systems, not NET Power. I'm for my mix up. Please let us know if you need anything else.

Thanks,
Molly

From: McEvoy, Molly
Sent: Tuesday, January 7, 2020 9:39 AM
To: Albright, David <Albright.David@epa.gov>
Cc: Kobelski, Bruce <Kobelski.Bruce@epa.gov>
Subject: Response to NET Power QASP Question

Good morning David,

Per our discussion, here is our response to NET Power's question about the need to include a full QASP with the initial permit application. The quality assurance and surveillance plan is a required element of the Testing and Monitoring Plan submitted with the permit application (40 CFR 146.90(k)). However, in the past EPA has recognized that the initial QASP will very likely need to be updated post-construction. Changes to this document may not trigger a major permit modification (40 CFR 144.41(h)).

Thanks,
Molly

Molly McEvoy
Office of Ground Water & Drinking Water
U.S. Environmental Protection Agency
Washington, D.C.
Phone: 202-564-4765